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Attorneys for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF TRACY GAO IN
SUPPORT OF GOOGLE LLC'S MOTION
IN LIMINE NO. 4 TO EXCLUDE
EVIDENCE AND ARGUMENT
REGARDING THE JOINING OF
AUTHENTICATED AND
UNAUTHENTICATED DATA**

Judge: Hon. Yvonne Gonzalez Rogers

Trial Date: January 29, 2024

1 I, Tracy Gao, declare as follows:

2 1. I am a member of the bar of the state of California and an associate attorney with
3 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. I submit this declaration in support of Google's Motion *In Limine* No. 4 to Exclude
7 Evidence and Argument Regarding the Joining of Authenticated and Unauthenticated Data.

8 3. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' proposed exhibit
9 No. 397, described by Plaintiffs as "Rule 1006 Summary Re: The data that Google collects on non-
10 Google websites that were visited in a private browsing mode, as produced during the Special Master
11 Process and reflected in the Hochman Opening Report, pp 68–69, pp. 106–107, Exhibit C, and Appendix
12 I; and Hochman Rebuttal Report, pp. 17–35, 43."

13 I declare under penalty of perjury of the laws of the United States that the foregoing is true
14 and correct.

15 Executed in Washington, D.C., on October 17, 2023.

16 By /s/ Tracy Gao
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